

TANNERS CREEK PLANT BOTTOM ASH POND RECOMMENDATION IMPLEMENTATION

Following are responses related to the implementation of recommendations outlined in Enclosure 2 as provided with the United States Environmental Protection Agency cover letter dated September 15, 2009:

6.1. Immediate/Urgent Repair Recommendations

No immediate or urgent repairs are recommended at this time.

- No action required.

6.2. Long Term Improvements

The owner should proceed as planned with installation of the proposed French drain to control seepage in the west dike and increase its stability. This seepage collection system is scheduled to be installed in the west dike embankment later in 2009.

Woody vegetation should be removed from the in-board slopes of the dikes and kept from reestablishing growth. Active maintenance of the vegetative growth should continue along with regular filling of rodent burrows.

Beyond the items noted above, no other long term improvements are recommended at this time.

- The French drain piping installation contract is in place. Pursuant to a recent meeting (August 27, 2009) with the Indiana Department of Environmental Management regarding the permitting of this effluent to Tanners Creek (receiving stream), it was determined that a more acceptable approach would be to return the water to the pond for discharge via its existing permitted outfall. Therefore, a pumping system is now being designed that will return the seepage water from the drain to the pond. Based on this recent development, the time required to design, procure and install the pumping system may cause the work to extend to June 2010.
- Woody vegetation has been removed from the inboard slopes. Maintenance of the vegetation and rodent control will continue on a regular basis moving forward.

6.3. Monitoring and Future Inspection Recommendations

Monitoring and future inspections should continue on their current schedule. For future monthly inspections, additional detail regarding visual observations made at the time of inspection should be included.

Monitoring of the two isolated seeps noted along the east dike embankment should continue with the monthly inspections performed by the plant. These items have been noted in previous annual inspections and methods to repair these locations should be investigated in the event that these seeps worsen and immediate repair is needed.

- Annual engineering inspections by American Electric Power Service Corporation's Civil Engineering Department are planned to continue. The most recent inspection was performed on September 15, 2009. A report outlining that inspection is forthcoming.
- Quarterly inspections per American Electric Power's Dam Inspection and Maintenance Program by Operations Personnel have been performed on the prescribed intervals and are planned to continue into the future.
- A camera inspection of the abandoned outfall is being arranged. Based on that inspection, a plan will be developed and executed for sealing the outfall. It is planned that the seepage for both locations can be mitigated by June 2010.

6.4. Time Frame for completion of Repairs/Improvements

The owner cited a 2009 completion date for the installation of the west dike seepage collection system. The owner should continue toward completion of this project as planned.

The isolated seeps on the east dike embankment should continue to be monitored. In the event these areas are observed to worsen, they should be repaired immediately.

- The seepage collection drain and the isolated east dike seep work will be completed as outlined above.

**TANNERS CREEK PLANT
FLY ASH POND
RECOMMENDATION IMPLEMENTATION**

Following are responses related to the implementation of recommendations outlined in Enclosure 2 as provided with the United States Environmental Protection Agency cover letter dated September 15, 2009:

6.1. Immediate/Urgent Repair Recommendations

No immediate or urgent repairs are recommended at this time.

- No action required.

6.2. Long Term Improvements

A slotted pipe toe drain system is currently being installed to replace the drainage ditch which currently collects seepage from the Upper Pond. The owner should continue as planned with this modification to improve the conveyance of water away from the toe.

Beyond completing the slotted pipe toe drain system, no other long term improvements are recommended at this time.

- The slotted drain pipe installation has been completed around the entire perimeter at the toe of the upper dike as planned.

6.3. Monitoring and Future Inspection Recommendations

Monitoring and future inspections should continue on their current schedule. For future monthly inspections, additional detail regarding visual observations made at the time of inspection should be included.

Additionally, active maintenance of the vegetative growth around the Fly Ash Pond will need to continue along with regular filling of rodent burrows.

- Annual engineering inspections by American Electric Power Service Corporation's Civil Engineering Department are planned to continue. The most recent inspection was performed on September 15, 2009. A report outlining that inspection is forthcoming.
- Monthly inspections by Operations Personnel have been performed on the prescribed intervals and are planned to continue into the future in accordance with American Electric Power's Dam Inspection and Maintenance Program.
- Vegetation maintenance continues on a regular basis. The most recent mowing was performed in September 2009.
- Animal burrows continue to be filled as they are identified. Most recently, four such burrows were reported to Operations Personnel upon completion of the most recent annual engineering inspection.

6.4. Time Frame for completion of Repairs/Improvements

The owner cited a 2009 completion date for the installation of the remainder of the slotted drain pipe system. The owner should continue toward completion of this project as planned.

- The slotted drain piping work was completed in August 2009 as planned.